

4. Defendant has not previously filed a motion for extension of time to answer or otherwise respond to Plaintiff's Complaint. This motion is being asserted in good-faith and not for purposes of undue delay.

5. Defendant's counsel has consulted with Plaintiff's counsel, and he has consented to the requested extension up to and including February 17, 2021.

6. A proposed order is submitted herewith.

WHEREFORE, Defendant respectfully requests an extension of time up to and including February 17, 2021, in which to answer or otherwise respond to Plaintiff's Complaint.

Respectfully submitted this 7th day of January, 2021.

/s/Akya S. Rice

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CERTIFICATE OF SERVICE

I, Kelly S. Hughes, hereby certify that on this day, January 7th, 2021, I electronically filed the foregoing **DEFENDANT'S CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND OR OTHERWISE PLEAD** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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